



William Cafaro, Esq.
ADMITTED IN NY, CA, MD & TX
Email: bcafaroe@cafaro.esq.com

Amit Kumar, Esq.
Managing Attorney
ADMITTED IN NY & NJ
Email: akumar@cafaro.esq.com

108 West 39th Street, Suite 602
New York, New York 10018
Telephone: 212.583.7400
Facsimile: 212.583.7401
www.cafaro.esq.com

Louis M. Leon, Esq.
Associate
ADMITTED IN NY
Email: lleon@cafaro.esq.com

Andrew S. Buzin, Esq.
Of Counsel
ADMITTED IN NY, FL & DC

August 16, 2022

Via ECF

Hon. Ronnie Abrams, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Lockett v. Hotel Hugo d/b/a Bar Hugo, et al
Case No.: 21-cv-7131

Your Honor,

This office represents the Plaintiff in the above referenced action brought under 42 USC 1981, Title II of the Civil Rights Act of 1964 and other state law causes of action. We write, jointly with the Defendants, in compliance with April 1, 2022 Order. First and foremost, the Parties apologize for the lateness of this joint letter.

Although the Parties continue to work together to exchange necessary discovery, we have been unable to complete discovery in accordance with the Court's latest scheduling Order. Due to this, we jointly request the Court adjourn the post-discovery conference scheduled for April 19, 2022 at 10:30 AM. The Parties further respectfully request the Court extend the discovery deadlines as follows:

<u>Deadline</u>	<u>Original Deadline</u>	<u>Requested Revised Deadline</u>
Completion of Fact Discovery	August 4, 2022	October 30, 2022
Completion of Expert Discovery	November 4, 2022	January 3, 2023

This is the Parties second request for an extension of time to complete discovery.

The Parties thank the Court for its courtesy in this regard.

Respectfully submitted,
LAW OFFICES OF WILLIAM CAFARO

/s/

By William Cafaro, Esq.
Amit Kumar, Esq.
Attorneys for the Plaintiff
108 West 39th Street, Suite 602
New York, New York 10018
(212) 583-7400
BCafaro@CafaroEsq.com
AKumar@CafaroEsq.com

CC:

All Counsel of Record (via ECF)

Application granted.

The post-fact discovery conference is hereby adjourned to November 18, 2022 at 10:30 a.m. The parties shall use the following dial-in information to call in to the conference: Call-in Number: (888) 363-4749; Access Code: 1015508. This conference line is open to the public.

SO ORDERED.

A handwritten signature in blue ink, appearing to be 'R. Abrams', written over a horizontal line.

Hon. Ronnie Abrams
8/17/22